

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL  
INSTRUMENTS ANTITRUST LITIGATION

MDL No. 2262

THIS DOCUMENT RELATES TO:

Master File No. 1:11-md-2262-NRB  
ECF Case

*Mayor and City Council of Baltimore v. Bank of Am. Corp.  
et al.*, 11-cv-5450

*Highlander Realty, LLC et al. v. Citizens Bank of Mass. et  
al.*, 13-cv-2343

*CEMA Joint Venture v. Charter One Bank, N.A. et al.*,  
13-cv-5511

**DEFENDANT CITIZENS BANK N.A.'s  
SUPPLEMENTAL CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1(b)(2), Defendant Citizens Bank, N.A., f/k/a RBS Citizens, N.A., f/k/a Citizens Bank of Massachusetts,<sup>1</sup> through counsel, submits this supplemental corporate disclosure statement, which replaces its corporate disclosure statements previously filed in the above captioned actions.

Citizens Bank, N.A., is a wholly owned subsidiary of Citizens Financial Group, Inc., f/k/a RBS Citizens Financial Group, Inc. Citizens Financial Group, Inc. is a public company organized under the laws of Delaware and as of October 31, 2014, 70.5% owned by RBSG International Holdings Limited. RBSG International Holdings Limited is a wholly owned subsidiary of The Royal Bank of Scotland PLC. The Royal Bank of Scotland PLC is a wholly owned subsidiary of The Royal Bank of Scotland Group PLC. The Royal Bank of Scotland Group PLC is a public

---

<sup>1</sup> Charter One Bank, N.A., named as a defendant in *CEMA Joint Venture v. Charter One Bank, N.A. et al.*, 13-cv-5511, is a trade name for Citizens Bank, N.A., the proper defendant legal entity.

limited company organized under the laws of the United Kingdom. No publicly held entity owns more than ten percent of the shares of The Royal Bank of Scotland Group PLC.

Respectfully submitted,

/s/ Fraser L. Hunter, Jr.

Fraser L. Hunter, Jr.

David S. Lesser

Alan E. Schoenfeld

WILMER CUTLER PICKERING

HALE AND DORR LLP

250 Greenwich Street

New York, New York 10007

Telephone: (212) 230-8800

Fax: (212) 230-8888

fraser.hunter@wilmerhale.com

david.lesser@wilmerhale.com

alan.schoenfeld@wilmerhale.com

/s/ Robert G. Houck

Robert G. Houck

Alejandra de Urioste

CLIFFORD CHANCE US LLP

31 West 52nd Street

New York, New York 10019

Telephone: (212) 878-8000

Fax: (212) 878-8375

robert.houck@cliffordchance.com

alejandra.deurioste@cliffordchance.com

*Attorneys for Defendant Citizens Bank, N.A.*

**CERTIFICATE OF SERVICE**

I, Fraser L. Hunter, Jr., hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on this 16th day of January, 2015.

/s/ Fraser L. Hunter, Jr. \_\_\_\_\_  
Fraser L. Hunter, Jr.